

REMARKS

By this Amendment, Applicant has canceled claims 13 and 22 without prejudice or disclaimer of the subject matter thereof. Also, Applicant has rewritten claims 12, 21, and 32 in independent form. Currently, claims 1-12, 14-21, and 23-32 are pending in the application. Claims 1, 12, 14, 21, 23, 25, 26, 28, 29, and 32 are independent claims.

Applicant respectfully requests that the Examiner consider the English translations of Japanese documents submitted on June 19, 2003. Further to the Information Disclosure Statement (IDS) filed on June 12, 2003, Applicant on June 19, 2003 submitted a full English translation (human translation) for JP 10-74685 and a partial English translation (human translation) for JP 11-168064. While the Examiner indicated that he had considered the IDS filed on June 12, 2003, he did not indicate that he had also considered the English translations submitted on June 19, 2003. Applicant respectfully requests that the Examiner consider the English translations submitted on June 19, 2003 and indicate that they were considered by making appropriate notations on the Form PTO 1449 submitted therewith.

In the outstanding Office Action, the Examiner rejected claims 13, 22, and 32 under 35 U.S.C. § 112, second paragraph, as being indefinite. See para. 1. By this Amendment, Applicant has canceled claims 13 and 22 without prejudice or disclaimer of the subject matter thereof. In addition, Applicant has amended claim 32 in independent form. Applicant respectfully submits that these cancellation and amendment of claims address the Examiner's rejection under § 112, second paragraph.

FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

1300 I Street, NW
Washington, DC 20005
202.408.4000
Fax 202.408.4400
www.finnegan.com

Similar to claim 32, Applicant has amended claims 12 and 21 in independent form.

In the outstanding Office Action, the Examiner rejected claims 1, 2, 4-6, 8, 9, 11-15, 17, 18, and 20-32 under 35 U.S.C. § 102(b) as being anticipated by Osanai et al. (U.S. Patent No. 5,864,389) and rejected claims 3, 7, 10, 16, and 19 under 35 U.S.C. § 103(a) as being unpatentable over Osanai et al. in view of Yuan et al. (U.S. Patent No. 6,130,517).

Applicant respectfully traverses the rejection under 35 U.S.C. §102(b) because Osanai et al. fails to disclose all of the elements recited in the claims. In order to properly anticipate Applicant's claimed invention under 35 U.S.C. § 102(b), each and every element of the claim in issue must be found, either expressly described or under principles of inherency, in a single prior art reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Finally, "[t]he elements must be arranged as required by the claim." M.P.E.P. §2131.

For example, Osanai et al. fails to disclose a stage assembly comprising a guide assembly, the guide assembly including, among other things, "a guide bar movable in a first direction . . . a stage movable . . . in a second direction substantially perpendicular to the first direction . . . the stage having a center of gravity substantially positioned in a plane parallel to the first and second directions, the plane parallel to the first and second directions having the center of gravity of the guide bar substantially positioned therein;

and an actuator component positioned on the guide bar substantially in the plane parallel to the first and second directions and aligned with the center of gravity of the stage in the second direction," as recited in claim 1.

As shown in Figs. 1-3, Osanai et al. discloses a movable guide 3 movable in the Y-direction and a movable stage 5 movable in the X-direction. The movable guide 3 includes movable elements 6a coupled to the opposite ends thereof. See Figs 1-3 and col. 4, lines 8-10. Osanai et al., however, fails to disclose that the center of gravity of the movable guide 3, the center of gravity of the movable stage 5, and the movable elements 6a are all substantially positioned in a plane parallel to the X- and Y-directions. Osanai et al. further fails to disclose that the movable elements 6a are aligned with the center of gravity of the movable stage 5 in the X-direction. In fact, Osanai et al. mentions nothing about the center of gravity of the movable guide 3, the center of gravity of the movable stage 5, or the position of the movable elements 6a in relation to the centers of gravity of the movable guide 3 and the movable stage 5.

To the extent that the Examiner is relying on inherency, the Examiner has failed to meet the required burden. See M.P.E.P. § 2112. The Examiner alleged that Osanai et al. discloses "a stage (5) . . . having a center of gravity substantially positioned in a plane parallel to the first and second direction, the plane parallel to the first and second directions having the center of gravity of the guide bar substantially positioned therein as inherently understood and as discussed in column 4, lines 6-36." Office Action, pages 2-3. The Examiner, however, has failed to produce a basis in fact or technical reason why, in Osanai et al., the plane having the center of gravity of the movable stage

5 substantially positioned therein must also necessarily and inevitably have the center of gravity of the movable guide 3 substantially positioned therein. Moreover, the Examiner also has failed to explain why a person of ordinary skill in the art would have so recognized the position of the center of gravity of the movable guide 3. Contrary to the Examiner's assertion, nothing in column 4, lines 6-36 supports the Examiner's alleged inherent disclosure in Osanai et al.

For at least these reasons, Osanai et al. fails to anticipate claim 1. Similarly, Osanai et al. also fails to anticipate any of claims 12, 14, 21, 23, 25, 26, 28, 29, or 32.

Osanai et al. fails to disclose an exposure apparatus comprising a stage assembly, the stage assembly comprising a guide assembly, the guide assembly including, among other things, "a guide bar movable in a first direction . . . a stage movable . . . in a second direction substantially perpendicular to the first direction . . . the stage having a center of gravity substantially positioned in a plane parallel to the first and second directions, the plane parallel to the first and second directions having the center of gravity of the guide bar substantially positioned therein; and an actuator component positioned on the guide bar substantially in the plane parallel to the first and second directions and aligned with the center of gravity of the stage in the second direction," as recited in claim 12.

Osanai et al. also fails to disclose a stage assembly comprising a guide assembly, the guide assembly including, among others, "a guide bar movable in a first direction . . . a stage movable . . . in a second direction substantially perpendicular to the first direction . . . the stage having a center of gravity spaced apart from the center

of gravity of the guide bar in the first direction; a first actuator component positioned on the guide bar and aligned with the center of gravity of the stage in the second direction . . . and a second actuator component positioned on the guide bar and aligned with the center of gravity of the guide bar in the second direction,” as recited in claim 14.

Furthermore, Osanai et al. fails to disclose an exposure apparatus comprising a stage assembly, the stage assembly comprising a guide assembly, the guide assembly including, among other things, “a guide bar movable in a first direction . . . a stage movable . . . in a second direction substantially perpendicular to the first direction. . . the stage having a center of gravity spaced apart from the center of gravity of the guide bar in the first direction; a first actuator component positioned on the guide bar and aligned with the center of gravity of the stage in the second direction . . . and a second actuator component positioned on the guide bar and aligned with the center of gravity of the guide bar in the second direction,” as recited in claim 21.

Furthermore, Osanai et al. fails to disclose a stage assembly comprising a guide assembly, the guide assembly including, among other things, “a first moving member movable in a first direction . . . a second moving member movable in a second direction substantially perpendicular to the first direction, the second moving member having a center of gravity substantially positioned in a plane parallel to the first and second directions, the plane parallel to the first and second directions having the center of gravity of the first moving member substantially positioned therein; and an actuator, at least part of the actuator being positioned on the first moving member, the actuator generating a force acting on the first moving member in the second direction, wherein a

portion where the force acts on the first moving member is substantially positioned in the plane parallel to the first and second directions and aligned with the center of gravity of the second moving member in the second direction,” as recited in claim 23.

Furthermore, Osanai et al. fails to disclose a stage assembly comprising a guide assembly, the guide assembly including, among other things, “a first moving member movable in a first direction . . . a second moving member movable in a second direction substantially perpendicular to the first direction, the second moving member having a center of gravity spaced apart from the center of gravity of the first moving member in the first direction; a first actuator, at least part of the first actuator being positioned on the first moving member, the first actuator generating a first force acting on the first moving member in the second direction, wherein a first portion where the first force acts on the first moving member is substantially aligned with the center of gravity of the second moving member in the second direction; and a second actuator, at least part of the second actuator being positioned on the first moving member, the second actuator generating a second force acting on the first moving member in the second direction, wherein a second portion where the second force acts on the first moving member is substantially aligned with the center of gravity of the first moving member in the second direction,” as recited in claim 25.

Furthermore, Osanai et al. fails to disclose a method for driving a stage assembly including, among other things, “applying a force on the first moving member at a portion in the second direction, wherein a center of gravity of the first moving member and a center of gravity of the second moving member are substantially positioned in a plane

parallel to the first and second directions, and wherein the portion is substantially positioned in the plane parallel to the first and second directions and aligned with the center of gravity of the second moving member in the second direction,” as recited in claim 26.

Furthermore, Osanai et al. fails to disclose a method for driving a stage assembly including, among other things, “applying a first force on the first moving member at a first portion in the second direction . . . and applying a second force on the first moving member at a second portion in the second direction . . . wherein the first portion is aligned with a center of gravity of the second moving member in the second direction, and the second portion is aligned with a center of gravity of the first moving member in the second direction,” as recited in claim 28.

Furthermore, Osanai et al. fails to disclose a stage assembly comprising a guide assembly, the guide assembly including, among other things, “a first moving member movable in a first direction . . . a second moving member movable in a second direction substantially perpendicular to the first direction . . . and an actuator, at least part of the actuator being positioned on the first moving member, the actuator generating a force acting on the first moving member in the second direction, wherein a portion where the force acts on the first moving member is substantially aligned with the center of gravity of the second moving member in the second direction,” as recited in claim 29.

Finally, Osanai et al. fails to disclose an exposure apparatus comprising a stage assembly, the stage assembly comprising a guide assembly, the guide assembly including, among other things, “a first moving member movable in a first direction . . . a

second moving member movable in a second direction substantially perpendicular to the first direction . . . and an actuator, at least part of the actuator being positioned on the first moving member, the actuator generating a force acting on the first moving member in the second direction, wherein a portion where the force acts on the first moving member is substantially aligned with the center of gravity of the second moving member in the second direction," as recited in claim 32.

Moreover, Yuan et al. fails to make up for these shortcomings of Osanai et al. Accordingly, the Examiner also has failed to establish a *prima facie* case of obviousness regarding any of independent claims 1, 12, 14, 21, 23, 25, 26, 28, 29, or 32.

For at least the foregoing reasons, independent claims 1, 12, 14, 21, 23, 25, 26, 28, 29, or 32 are in condition for allowance. Claims 2-11, 15-20, 24, 27, 30, and 31 are also in condition for allowance at least by virtue of their dependency from respective allowable independent claims.

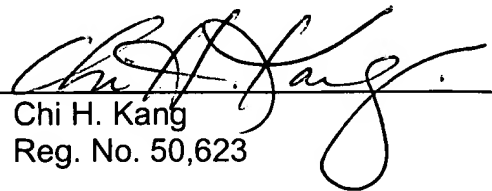
In view of the foregoing remarks, Applicant respectfully requests the reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

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By: 
Chi H. Kang
Reg. No. 50,623

FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

1300 I Street, NW
Washington, DC 20005
202.408.4000
Fax 202.408.4400
www.finnegan.com